

Consumer Reports Address Discrepancies & Records Disposal Procedures		
INTRODUCTION AND PURPOSE		
DEFINITIONS		
EXCEPTIONS		
PENALTIES		
RECORD RETENTION REQUIREMENTS		
717.82 Duties of Users of Consumer Reports Regarding Address Discrepancies	Yes/No	Comments
1. Determine whether a user of consumer reports has policies and procedures to recognize notices of address discrepancy that it receives from a nationwide consumer reporting agency (NCRA) in connection with consumer reports.		
2. Determine whether a user that receives notices of address discrepancy has policies and procedures to form a reasonable belief that the consumer report relates to the consumer whose report was requested. (717.82(c)) See examples of reasonable policies and procedures “to form a reasonable belief” in 717.82(c)(2)		
3. Determine whether a user that receives notices of address discrepancy has policies and procedures to furnish to the NCRA an address for the consumer that the user has reasonably confirmed is accurate, if the user: a. can form a reasonable belief that the report relates to the consumer; b. establishes a continuing relationship with the consumer; and c. regularly furnishes information to the NCRA. (717.82(d)(1)) See examples of reasonable confirmation methods in 717.82(d)(2).		
4. Determine whether the user’s policies and procedures require it to furnish the confirmed address as part of the information it regularly furnishes to an NCRA during the reporting period when it establishes a relationship with the consumer. (717.82(d)(3))		

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<p>5. If procedural weaknesses or other risks requiring further information are noted, obtain a sample of consumer reports requested by the user from an NCRA that included notices of address discrepancy and determine:</p> <ul style="list-style-type: none">a. how the user established a reasonable belief that the consumer reports related to the consumers whose reports were requested: andb. if a consumer relationship was established:<ul style="list-style-type: none">i. whether the credit union furnished a consumer's address that it reasonably confirmed to the NCRA from which it received the notice of address discrepancy; andii. whether it furnished the address in the reporting period during which it established the relationship.		
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